



U.S. Department of Justice

*United States Attorney
Southern District of New York*

MEMO ENDORSED

*United States District Courthouse
300 Quarropas Street
White Plains, New York 10601*

October 14, 2020

The Honorable Kenneth M. Karas
United States District Judge
Southern District of New York
United States Courthouse
300 Quarropas Street
White Plains, New York 10601

Re: *United States v. William Grogg, 20 Cr. 35*

Dear Judge Karas:

As discussed at the last appearance before Your Honor on October 6, 2020, the Government respectfully submits this joint proposal to modify the above-referenced defendant's bail conditions by adding the following conditions:

- The defendant shall be prohibited from dissipating personal or business assets during the pendency of this matter.
- The defendant shall be prohibited from applying for any new line of credit, whether personal or business-related, during the pendency of this matter.
- At a time to be determined, the defendant shall resign as administrator of MCA Payserve Inc. 401(k) Profit Sharing Plan and Trust (the "Plan") and facilitate the appointment of a new independent fiduciary for the Plan, who will be selected after a bidding process by the U.S. Department of Labor. Mr. Gold and I are working through the details of the defendant's resignation and the appointment of a new independent fiduciary.

All other bail conditions are to remain the same. Accordingly, the parties respectfully request that the Court grant the proposed modification of the defendant's release conditions.

The Honorable Kenneth M. Karas

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The proposed bail modifications
are approved.

So Ordered.



10/14/20

Respectfully submitted,

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Acting United States Attorney

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cc: Ben Gold, Esq. (by Email)
Vincent Adams, Pretrial Services Officer (by Email)